

**BATHAE DUNNE LLP**  
Yavar Bathae (CA 282388)  
yavar@bathaeedunne.com  
Andrew C. Wolinsky (CA 345965)  
awolinsky@bathaeedunne.com  
445 Park Avenue, 9th Floor  
New York, NY 10022  
(332) 322-8835

Brian J. Dunne (CA 275689)  
bdunne@bathaeedunne.com  
Edward M. Grauman (*pro hac vice*)  
egrauman@bathaeedunne.com  
901 S. MoPac Expressway  
Barton Oaks Plaza I, Suite 300  
Austin, TX 78746  
(213) 462-2772

*Interim Co-Lead Counsel for the  
Advertiser Classes*

**SCOTT+SCOTT ATTORNEYS AT LAW LLP**  
Amanda F. Lawrence (*pro hac vice*)  
alawrence@scott-scott.com  
Patrick J. McGahan (*pro hac vice*)  
pmcgahan@scott-scott.com  
Michael P. Srodoski (*pro hac vice*)  
msrodoski@scott-scott.com  
156 South Main Street, P.O. Box 192  
Colchester, CT 06415  
Tel.: (860) 537-5537

Patrick J. Coughlin (CA 111070)  
pcoughlin@scott-scott.com  
Carmen A. Medici (CA 248417)  
cmedici@scott-scott.com  
Hal D. Cunningham (CA 243048)  
hcunningham@scott-scott.com  
Daniel J. Brockwell (CA 335983)  
dbrockwell@scott-scott.com  
600 W. Broadway, Suite 3300  
San Diego, CA 92101  
Tel.: (619) 233-4565

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al.,  
  
Plaintiffs,  
  
v.  
  
META PLATFORMS, INC.,  
  
Defendant.

Case No. 3:20-cv-08570-JD

Hon. James Donato

**DECLARATION OF BRIAN J. DUNNE  
IN SUPPORT OF ADVERTISER  
PLAINTIFFS' MOTION TO EXCLUDE  
OPINION TESTIMONY OF DR.  
CATHERINE TUCKER**

1 I, Brian J. Dunne, declare and state as follows:

2 1. I am an attorney licensed in the State of California and admitted to the United States  
3 District Court for the Northern District of California. I am a partner at Bathaee Dunne LLP, counsel for  
4 the Advertiser Plaintiffs in the above-captioned matter. I have personal knowledge of the facts set forth  
5 herein and, if called as a witness, could and would testify competently to them.

6 2. This declaration is made in support of Advertiser Plaintiffs' Motion to Exclude Opinion  
7 Testimony of Dr. Catherine Tucker.

8 3. Attached as **Exhibit 1** is a true and correct copy of excerpts from the certified transcript  
9 of the February 28, 2024 Deposition of Catherine Tucker.

10 4. Attached as **Exhibit 2** is a true and correct copy of the Advertiser Merits Report of  
11 Catherine Tucker Errata, dated January 16, 2024.

12 5. Attached as **Exhibit 3** is a true and correct copy of the Advertiser Merits Rebuttal Report  
13 of Catherine Tucker, dated February 9, 2024.

14 6. Attached as **Exhibit 4** is a true and correct copy of the Expert Merits Report of Michael  
15 A. Williams, Ph.D., dated January 12, 2024.

16 7. Attached as **Exhibit 5** is a true and correct copy of the Expert Merits Rebuttal Report of  
17 Michael A. Williams, Ph.D., dated February 9, 2024.

18 8. Attached as **Exhibit 6** is a true and correct copy of a document produced by Meta in this  
19 litigation with the Bates Number PALM-012438930.

20 9. Attached as **Exhibit 7** is a true and correct copy of PX 581 and PX 582, which are a  
21 parent email and attachment produced in this litigation by Meta, marked as exhibits at the deposition of  
22 Jon Eide.

23 10. Attached as **Exhibit 8** is a true and correct copy of class certification Expert Reply  
24 Report of Michael A. Williams, Ph.D., dated September 15, 2023.

25 I declare under penalty of perjury that the foregoing is true and correct. Executed on April 5,  
26 2024, in Austin, Texas.

27 /s/ Brian J. Dunne  
28 Brian J. Dunne